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Attorney for Plaintiffs and the Putative Classes

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

NATASHA ALI and AMANDA PERKINS
individually and on behalf of all others
similarly situated,

CASE NO. 3:22-CV-08578-SI

Plaintiffs.

-VS.-

MINDVALLEY, LLC.

Defendants.

**JOINT STIPULATION TO EXTEND
THE TIME FOR PLAINTIFFS TO
AMEND THEIR COMPLAINT OR
OTHERWISE RESPOND TO
DEFENDANT'S MOTION TO
DISMISS**

Plaintiffs Natasha Ali and Amanda Perkins (“Plaintiffs”) and Defendant Mindvalley, LLC (“Defendant”) by and through their undersigned counsel, hereby submit this Joint Stipulation to Extend the Time for Plaintiffs to Amend their Complaint or Respond to Defendant’s Motion to Dismiss. (ECF No. 15). In support of the stipulation, the Parties state as follows:

1. WHEREAS, on December 13, 2022, Plaintiffs filed this action (ECF No. 1) and
Defendant was served with the summons and complaint on December 15, 2022;

1 2. WHEREAS, on January 5, 2023, the Parties stipulated to allow Defendant an
2 additional twenty-one (21) days to answer or otherwise respond to Plaintiffs' complaint (ECF No.
3 11);

4 3. WHEREAS, on January 15, 2023, the Parties met and conferred and stipulated to
5 allow Defendant up to February 16, 2023 to answer or otherwise respond to Plaintiffs' complaint
6 (ECF No. 14);

7 4. WHEREAS, on February 16, 2023, Defendant filed its Motion to Dismiss (ECF
8 No. 15) and the Parties thereafter met and conferred to discuss the issues raised in Defendant's
9 Motion to Dismiss;

10 5. WHEREAS, Plaintiffs' Opposition to the Motion to Dismiss is currently due March
11 2, 2023, Defendant's Reply In Support of the Motion to Dismiss is currently due March 9, 2023,
12 and the Court has set the hearing for oral argument on the Motion to Dismiss on March 28, 2023
13 (ECF No. 15);

14 6. WHEREAS, in response to the arguments set forth in the Motion to Dismiss,
15 Plaintiffs are contemplating amending their complaint and/or voluntarily dismissing the claims
16 brought on behalf of Plaintiff Natasha Ali specifically, and request additional time to so amend or
17 otherwise respond to Defendant's Motion to Dismiss;

18 7. WHEREAS, good cause exists, this stipulation is not made for the purpose of delay,
19 no scheduling order has been entered in the case, and no other deadlines in this matter are currently
20 pending;

21 8. NOW THEREFORE, and subject to the Court's approval, the Parties stipulate as
22 follows:

23 • Plaintiffs' deadline to amend their complaint or otherwise respond to the
24 Motion to Dismiss shall be March 24, 2023;

- Defendant's Reply In Support of the Motion to Dismiss, if necessary, shall be due April 7, 2023; and
- The hearing on Defendant's Motion to Dismiss, if any, shall be continued to April 21, 2023, or as soon thereafter as the Court can accommodate.

Respectfully submitted March 1, 2023.

**MILBERG COLEMAN BRYSON
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s/ John J. Nelson
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Attorneys for Defendant Mindvalley, LLC

1
2 **[PROPOSED] ORDER**
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4 PURSUANT TO STIPULATION, IT IS SO ORDERED as amended below:
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6 The Motion hearing will held 4/28/2023 at 10:00 a.m. via Zoom webinar. Counsel are to send an email to
7 sicrd@cand.uscourts.gov by 4/19/2023 at 2 pm to register appearances. The Initial Case Management
8 Conference is continued to 6/2/2023 at 3:00 p.m. by Zoom webinar. Joint Case Management Statements
9 due by 5/26/2023. Counsel are to register for appearances by 5/24/2023 at 2 pm.
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11 DATED: March 1, 2023

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13 The Honorable Susan Illston
14 United States District Judge
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CERTIFICATE OF SERVICE

I hereby certify that on March 1, 2023, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify the foregoing document is being served today on all counsel of record in this case via transmission of Notice of Electronic Filing generated by CM/ECF.

/s/ John J. Nelson
John J. Nelson, Esq.

ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)

I, John J. Nelson, attest that concurrence in the filing of this document has been obtained from the other signatory. Executed on March 1 2023, in San Diego, California.

/s/ John J. Nelson
John J. Nelson, Esq.